

ONE PAGE SUMMARY OF JOHN DOE

DEPOSITION DATE: MM DD, 2023

Jane Doe (an infant over the age of fourteen), By And Through Her Father And Natural Guardian, John Doe, And John Doe, Individually

Vs.

XXXXX , XX And State Of XX

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| | Direct Examination by Mr. XX | |
| 12 | John Doe stated that he lived at YY XX, XXX, with his wife and four children. He mentioned that he had been married for more than ten years and told not to make him look bad for it. | Residence and Family Details |
| 13 | Mr. Doe stated that he was still in his first marriage and confirmed that it was his only marriage. He mentioned that he holds a J.D. from XX, currently practices law at a mid-sized firm focusing on personal injury cases and that the firm's name was "XX & ZZ." | Personal Background and Education |
| 14 | Mr. Doe confirmed that he was the Doe in the XX & ZZ case. He stated that he had been skiing since he was a boy and enjoyed it as a hobby, although it was not his main sport. He would do it as a family activity. He was YY years old now. | Introduction and Background of John Doe |
| 15 | Mr. Doe mentioned that he reassessed himself and acknowledged that he was not as good as he used to be, identifying himself as a moderate skier due to his familial commitments. He confirmed that he did witness the events related to the claim but clarified that he was not with XXXX during her fall and did not see it happen. | Self-Assessment and Witnesses |
| 16 | Mr. Doe confirmed that he took his family to XXX on MM DD, 2020, and they arrived the night before, staying at a local bed and breakfast. He mentioned that they rented skis the following morning from a shop practically across the street and estimated their arrival at the mountain was probably around ten or eleven o'clock. | Family Trip to XXX |
| 17 | Mr. Doe mentioned that they skied right up until four o'clock and were not the first ones on the slope. He stated that he skied most of the time with XXXX, who had a fifteen-year-old brother who was a better skier, while the younger children were just learning to ski. He had skied with her most of the time. At that time, XXXX had a thirteen-year-old brother who, along with her, had been a better skier than him. Additionally, they had two younger children who had not been as skilled. They had been beginner skiers, just reaching the level where they could attempt intermediate slopes. | Skiing Duration and Companions |
| 18 | Mr. Doe mentioned that when they started skiing, they opted for an easy beginner hill despite some complaints from teenagers. His wife had likely been at the same skill level. He did not remember how many times XXXX and XX had gone off on their own, but it had only happened once or twice. Apart from the current instance, he recalled possibly one other time they had done so. He recalled that during the specific occasion when the injury | Skiing Experience and Injury Occasion |

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| | occurred, he went up the hill with his son and had planned to take one of two runs, XXX or XXXX. | |
| 19 | Mr. Doe stated that he wanted to test them to see if they could get up to the summit. He mentioned that after XXXX and XX went a different way, he continued along the summit and never saw her again until they met at the hospital. | Intentions for Summit Test |
| 20 | Mr. Doe and his wife were in gondola and it was long blue run. Mr. Doe thought that XXXX probably got tired of waiting and went back up the hill, and then he received a phone call from someone named XXX, who identified himself as a ski patrol. XXX informed him that his daughter had an accident and asked if he could come to first aid, to which he replied that he had just gotten on a gondola and could be there in about twenty minutes. | Emergency Call Regarding Daughter |
| 21 | Mr. Doe mentioned that someone on the phone indicated a displacement in her leg but did not specify a fracture, and he expressed the urgency of going to the hospital sooner rather than later. He explained that despite skiing slowly with two little girls, they managed to make their way down and spoke with someone from EMS, specifically mentioning a brief conversation with XXXX. | Discussion of Leg Injury and Hospital Urgency Journey Down the Mountain and EMS Communication |
| 22 | Mr. Doe stated that he was relieved XXXX was speaking and did not have a neck injury, feeling comfortable with the medical team taking her. X-rays were taken in XXX Upon reaching the hospital, they found two fractures in her pelvis and a displaced femur fracture, although he was unsure about the need for surgery. | Medical Condition and Hospital Visit |
| 23 | Mr. Doe explained that they were given a choice to have XXXX taken to XXX or XX, and they ultimately decided on XXX because it was a simpler option. He noted that they were informed that transferring by vehicle was cheaper and faster than using a helicopter. | Choice of Hospital for further treatment |
| 24 | Mr. Doe stated that the doctors at XXX Hospital indicated there was a ninety-five percent chance XXXX would need surgery. However, due to her age, they wanted to attempt to manipulate the issue under anesthesia before proceeding with surgery. | Overview of Surgical Needs for XXXX |
| 25 | Mr. Doe stated that he arrived as soon as he could but did not spend the night. He clarified that the hospital's actions related to COVID protocols did not influence their decision to not allow him in the room because that occurred about a week later. | Timeline of Events and Hospital Protocols |
| 26 | Mr. Doe mentioned that, based on his understanding of propofol, there could be pain involved, although he did not specifically remember it. He added that he initially thought manipulations were performed in the room but later recalled that she had been wheeled out of a surgery room. | Discussion on Anesthetic Procedures |
| 27 | Mr. Doe mentioned that the team of surgeons deserved credit for their efforts and acknowledged that the decision they made turned out to be correct. He confirmed that he had to make several modifications to their home to assist XXXX with her mobility after the accident, including renting a wheelchair and purchasing a walker. | Surgeons and Modifications for Mobility for XXXX |
| 28 | Mr. Doe clarified that the duration was not five weeks, but rather six or seven weeks, and mentioned that she was non-weight-bearing for several weeks after the cast was removed. He explained that she used a walker while the cast was on and switched to using crutches once the cast was taken off. | Duration of Non-Weight Bearing Ambulation Aids Used |

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| 29 | Mr. Doe mentioned that XXXX was on crutches for at least another month. When asked about using a cane, he stated that at some point XXXX was given permission to bear her weight but initially required crutches for longer distances. | Crutches and Recovery |
| 30 | Mr. Doe explained that due to COVID, XXXX never returned to school after it ended remotely in the spring of 2020, which he acknowledged as a difficult period. He clarified that he wasn't certain whether it was fully remote or just closed during that time, but he recalled home assignments were given before she graduated. | Impact of COVID on School Attendance |
| 31 | Mr. Doe stated that XXXX's school district was in XXXX and clarified that XXXX was not part of the XXXX School District, though it was in the same township of XXXX XXX but a separate district. He expressed uncertainty about the reasons for XXXX's transfer to XXXX for her senior year, explaining it was not related to the accident and attributed it to social reasons. He added that they owned a condo in XXXX, which they used as a home address. | School District Identification Reason for Transfer |
| 32 | Mr. Doe stated that the issue mentioned had nothing to do with the case at hand. He confirmed that he had out-of-pocket medical expenses from the incident, amounting to about forty thousand dollars. | Relevance of Issue and Medical Expenses |
| 33 | Mr. Doe stated that XXXX's anorexia was triggered when her cast came off and she became hyper-focused on her deformed leg. He mentioned having personal expenses for therapies that were not fully covered by insurance, specifically recalling XX as her insurance provider at the time. | Trigger of Anorexia and Insurance Coverage |
| 34 | Mr. Doe stated that they had to drive her to the hospital two or three times a week, covering the costs out of pocket because insurance never reimbursed them. He mentioned that XXXX was hospitalized due to worsening anorexia and that XXX Medical Center did a good job covering the hospitalization. | Hospital Visits and Expenses |
| 35 | Mr. Doe mentioned that they had put her right into XXXXXX afterward and noted that XXXXXX was partially covered by insurance but not fully. He believed that the bill from the XXZZXX facility was two hundred and fifty dollars an hour. | XXXXXX Facility Insurance Coverage |
| 36 | Mr. Doe mentioned that he would need to check the records for the exact number of hours charged but stated that XXXX had gone for a few months. He confirmed that his wife had a record or logbook of their expenses and indicated he could obtain it. | Discussion of Charges and Expense Records |
| 37 | Mr. Doe stated that XXXXXX was very expensive and mentioned that they were responsible for around four hundred dollars daily or weekly after insurance, though he was uncertain of the exact amount. He also noted that they encountered some unexpected bills that they had to pay. He assured that if they needed to provide a list of unreimbursed medical expenses, Mr. Doe would consult with his wife and amend their claim accordingly. | XXXXXX Expenses Unreimbursed Medical Expenses Planning |
| 38 | Mr. Doe stated that there was no need to supplement the insurance and confirmed that his wife could handle it. He mentioned that his wife had called multiple times and had taken the phone away from their child. | Discussion on Insurance and Phone Calls |
| 39 | Mr. Doe mentioned that XXXX first started making complaints about her body image the day she came home from getting the cast-off. XXXX started receiving treatment for Anorexia in MM 2020. He noted that XXXX became more focused on her body image and started to lose weight after | XXXX's Body Image Concerns |

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| | gaining weight due to being sedentary for several weeks because of her injuries. | |
| 40 | Mr. Doe stated that he did not recall knowing about anorexia at that time and mentioned that he thought if his wife lost weight, the indentation would be less noticeable, indicating a direct connection. He answered that he did not suggest his wife lose weight, clarified that his wife was associated with XXXZ, and explained it promotes a healthy lifestyle, also confirming he never heard her make weight loss suggestions for their daughter. | Discussion on Anorexia and Weight Loss Suggestions |
| 41 | Mr. Doe confirmed that he heard his wife make suggestions to their daughter about losing weight. He stated that he was present for his daughter's testimony and heard questions about Dr. XXXZ's C.P.S. report. | Testimony and Suggestions Regarding Weight |
| 42 | Mr. Doe stated that it was a verbal report made by XXXZ related to her duties, based on a general duty rather than a specific event. He mentioned that they did meet with XXX County C.P.S. workers, but they did not explain why the report was called in; however, he indicated that they understood the situation. | Report Description and Meeting with C.P.S. |
| 43 | Mr. Doe stated that there were no previous C.P.S. calls before a certain incident, but there had been another call since then, which he found to be similar and unfounded. He mentioned uncertainty regarding who made the other C.P.S. call and speculated that it could have been a follow-up. | C.P.S. Call Incidents |
| 44 | Mr. Doe acknowledged that he understands a teenager arguing with her mother often and affirmed he knew a medical record notation. He stated that XXXX was never hit by a belt and suggested it may have been a misunderstanding related to a young child recounting events about family abuse. | Teenage Disputes and Medical Misunderstandings |
| 45 | Mr. Doe stated that there was no foundation to the allegations and emphasized that neither he nor his wife abused their kids. He claimed that he was unaware of any reports regarding a pillow being held over XXXX's head. | Response to Abuse Allegations |
| 46 | Mr. Doe denied having any partner abuse as suggested by Dr. XXXZ, stating that he was not under investigation at the time and that the issue only involved his wife. He expressed hope that his wife would avoid future surgery and mentioned that Dr. ZXXX, the plastic surgeon, had recommended a revision. | Denial of Partner Abuse and Surgical Concerns |
| 47 | Mr. Doe mentioned that they contacted a recommended doctor for surgery at XXX Hospital. He recalled that a plastic surgeon prepped XXXX for surgery but decided against it, believing he couldn't make XXXX's appearance any better. | Surgery Recommendation and Decision |
| 48 | Mr. Doe explained that the trauma caused a fissure by separating XXXXs' muscle from the epidermis, which led to water stagnation and lymph nodes forming to absorb the liquid. He indicated that he respected the decision of the surgeon to refrain from draining the lymph nodes, believing it could worsen the indentation. | Trauma Effects and Surgical Decisions |
| 49 | Mr. Doe indicated that he did not ask about the condition but noted that enlarged lymph glands or nodes could be felt. He mentioned that XXXX had been intensely focused on poking at that area, which also troubled her. She began staring at herself in a mirror and refused to wear a bathing suit throughout the summer. Within weeks, she received a diagnosis of anorexia, which she could not have had before the accident, as she had | Discussion of Medical Condition of XXXX |

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| | previously eaten well and gained weight while wearing the cast. | |
| 50 | Mr. Doe confirmed that he could see the attorney and commented on the doctor's attractiveness. He indicated that he had only met the doctor at the hospital and was unsure of his name, stating he could look it up, but it didn't matter at that moment. | Witness Confirmation and Doctor Inquiry |
| 51 | Mr. Doe stated that the doctor mentioned a possible future procedure related to removing lymph nodes but was unsure about its specifics. He affirmed that there was another provider he noticed, specifically Dr. ZZZX's partner, whose name was Dr. ZZZX. | Possible Future Procedure and Noticed Provider |
| 52 | Mr. Doe indicated that Dr. ZZZX treated her more than Dr. ZZZX and mentioned that they had to follow up three or four times after leaving the hospital. He confirmed that they were seeing the same practice and noted that they saw ZZZX only once, and ZZZX three times. Additionally, he stated there were no other practices or doctors besides the doctor at XXX Hospital. | Medical Follow-Up and Treatment Confirmation |
| 53 | Mr. Doe mentioned that although he wouldn't admit it, he would probably say Mr. Doe's wife did it more than he did. He stated that no one ever got to him regarding that incident, despite being asked about speaking to anyone else that day. | Discussion about marriage and incident communication |
| 54 | Mr. Doe expressed uncertainty about the last question and requested it be repeated. He explained that when they first purchased tickets, someone had stolen XXXX's card, which required him to buy her a second card. | Supplementing the Last Question |
| 55 | Mr. Doe mentioned that he might have written an email concerning the situation but didn't remember specific details. He indicated that someone had called him about the matter, noting that they were waiving the extra fee, although he clarified that it wasn't directly related to the case. | Email Inquiry and Fee Waiver |
| 56 | Mr. Doe mentioned that he only needed a couple of minutes and noted the thoroughness of the questioning. He affirmed that XXXX indicated she didn't fall and described her as a good skier. | Initial Remarks and Questions about XXXX |
| 57 | Mr. Doe explained that XXXX's ski came off probably due to an improper angle at a xx, resulting in her falling while on one ski. He mentioned that she told him about sliding on a double black diamond slope and hitting a hard object thereafter. He expressed surprise upon returning to the site, noting the absence of simple barriers to prevent accidents, indicating that he had never been down that hill before. | Accident Description Site Observation |
| 58 | Mr. Doe emphasized that a barrier or at least an orange fence was necessary to prevent people from sliding into the structure. He mentioned that he went to XXX about a month after the accident, in very late MM, and confirmed that the mountain was closed during that visit. | Need for Safety Barrier |
| 59 | Mr. Doe stated that there was no one present at the location when he parked his car and walked up the hill. He confirmed that it was closed for the ski season when he visited, noting that nothing was running at that time. | Witness Statement on Ski Season Closure |
| 60-61 | He expressed his disappointment that it was closed but noted that the walk up the hill was interesting and the best exercise he had in months. He stated that his goal was still on, and confirmed that there was still snow covering, albeit less than before. | Disappointment and Exercise Experience |
| 61 | Mr. Doe was noted to be a very good family man, and he had a strong sense of professionalism. The deposition was concluded at T:TT p.m., | Conclusion of Deposition |